

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

CITIZENS FOR TRUMP, et. al.)	CASE NO. 1:16-cv-1465
)	
Plaintiffs,)	JUDGE GWIN
v.)	
)	
CITY OF CLEVELAND, et. al.,)	<u>MEMORANDUM IN OPPOSITION TO</u>
)	<u>PROPOSED BRIEFING SCHEDULE</u>
Defendants.)	
)	
)	
)	

Defendant, The City of Cleveland (Cleveland) submits this opposition to the plaintiffs' motion to have the city's response to their memorandum due tomorrow by 5:00 p.m. Cleveland first notes that plaintiffs' waited almost three weeks after Cleveland announced the regulations for the Republican National Convention (RNC) to file their lawsuit. Secondly, Cleveland would like to point out to the court that necessary and interested parties to the issues raised in this lawsuit have not been made defendants. Under 18 U.S.C. 3506(e) the RNC has been designated by the Secretary of Homeland Security a National Special Security Event (NSSE) giving the United States Secret Service (Secret Service) jurisdiction to create a security plan to protect the RNC from terrorist and criminal attack. Many of the restrictions complained of in the complaint are a result of the Secret Service's security plan. In addition, there are other necessary and interested parties that should be given an opportunity to be heard in this matter. The Republican Committee on Arraignments and the Host Committee are entities that have reserved parks and space in which to put on the RNC. Plaintiffs' proposed relief would dramatically affect the plans for the RNC, and curtail significant elements of the convention. Giving the defendants

approximately 24 hours to respond is inappropriate given the importance of the RNC, and the security threats that plaintiffs proposed relief would encourage.

Cleveland cannot speak for the other necessary and interested parties. While Cleveland believes that it could have a memorandum completed by June 17, 2016, it respectfully suggests that a Case Management Conference be immediately scheduled so that an appropriate briefing schedule can be set with input from all parties.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s Stewart Hastings
Counsel for Defendants